

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(Charleston Division)

FORTRA LLC and ECRIME  
MANAGEMENT STRATEGIES INC., d/b/a  
PHISHLABS,

Plaintiffs,

v.

DOPPEL INC. and PATRICK LELAND,

Defendants.

C/A No.: 2:25-cv-03783-DCN

**Motion in Support of  
*Pro Hac Vice* Application  
Catherine Y. Lui**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Catherine Y. Lui be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

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☐ No duty of consultation is required because the opposing party is proceeding pro se.

**Local Counsel for Defendant Doppel Inc.**

*s/John P. Linton, Jr.*

John P. Linton, Jr.

Federal Bar Number 11089

WALKER GRESSETTE & LINTON, LLC

P.O. Box Drawer 22167

Charleston, SC 29413

(843) 727-2252

Linton@wglfirm.com

Charleston, South Carolina

June 19, 2025